

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

ADRIAN DUNN,

Plaintiff,

v.

Case No. 4:16-CV-00493-BCW

UNITED STATES OF AMERICA

Defendant.

(Evidentiary Hearing)
PLAINTIFF'S EXHIBIT LIST

<input type="checkbox"/> = offered & admitted w/o objection Ex = offered, but objected to and excluded DB = admitted, de bene					Ltd = admitted for limited purposes X = offered & admitted over objection NO = marked, but not offered WD = offered then withdrawn	Stip to Found	Stip to Admiss
Exhibit No.	Action Taken	Date	Time	Description			
1				Office of the Inspector General: Review of the Dept's Oversight of Cash Seizure & Forfeiture Activities (74 pages)			
2				Caprice Title & Owners' Registration Receipt (3 pages)			
3				Auto Insurance ID Card & Payment Documentation (3 pages)			
4				Caprice Owners' Manual & Warranty Information (5 pages)			
5				Missouri Vehicle Titling (4 pages)			
6				AD Towing Articles of Inc. & EIN # (4 pages)			
7				AD Towing Receipts, Company Insurance, & Business Card (5 pages)			
8				AD Home Remodeling EIN # (2 pages)			
9				AD Detailing Business Zoning Clearance (2 pages)			
10				Commercial Lease Agreement (6 pages)			
11				Adrian's Proof of Purchase of Trailer (2 pages)			
12		7.18.17		Suppression Hearing Transcript (59 pages)			
13				Detective Daneff's Investigative Report (9 pages)			

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14				Emails between Agent King and Jaynie Zakibe re: vehicle storage facility (1 page)		
15				Emails between Agent King and Jaynie Zakibe re: "innocent owner" (1 page)		
16				U.S. Customs and Border Protection Hold Harmless Release Agmt; letter re: release agmt; seized asset claim form; CAFRA form (4 pages)		
17				DOJ Application for Transfer Forfeited Property (3 pages)		
18				Emails between Agent King and Jaynie Zakibe re: Dunn's forfeiture claim (1 page)		
19				Email from Agent King to Jaynie Zakibe re: administrative forfeiture of Mr. Dunn's property (1 page)		
20				Government forms re: sale of Caprice (4 pages)		
21				Government forms re: sale of Corvette (6 pages)		
22				ICE Report of Investigation - list of items seized from execution of search warrant (3 pages)		
23	✓	7-18-17	11:39	Photo 204: Rear of Toyota Sienna Van		
24	✓	"	11:43	Photo 205: Panel of Toyota Sienna Van		
25	✓	"		Photo 206: Close-up of van panel		
26	✓	"		Photo 207: Open van panel showing wrapped bricks inside		
27	✓	"		Photo 208: Wrapped cash		
28	✓	"		Photo 209: Close-up of wrapped cash		
29				Photo 210: Wrapped cash inside van		
30				Photo 215: 8717 Kentucky address		
31				Photo 220: 1974 Chevy Caprice		
32				Photo 221: Photo of refrigerator inside 8717 Kentucky		
33				Photo 222: Wrapped plastic bag in freezer		
34				Photo 228: Marijuana in plastic bag		
35				Photo 229: Black tar heroin		

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36				Photo 230: Pistol on couch		
37				Photo 234: Jacket from closet		
38				Photo 236: Pistol in pocket		
39				Photo 240: ADT security services w/ Mr. Dunn's info		
40				Photo 243: Open garage w/ 1974 Chevy Caprice		
41				Photo 244: Plastic bag in trunk of Caprice		
42				Photo 245: Close-up of plastic bag		
43				Photo 247: Money in plastic bag		
44				Photo 249: Air mattress in bedroom		
45				Criminal Trial Transcript p. 559, 560		
46				Insurance information for Chevy Corvette (2 pages)		
47		7-18-17		affidavit for probable cause of Mark King P. 26		
48						
49						
50						
D1				Demonstrative Exhibit 1 – PowerPoint Slides		

Dated: July 17, 2017

Respectfully submitted,

s/ Brent Dwerlkotte

Andrew D. Carpenter, MO Bar #48454

Brent Dwerlkotte, MO Bar # 62864

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